

1 [Submitting Counsel on Signature Page]

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8 **IN THE UNITED STATES DISTRICT COURT**
9 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

10 People of the State of California, et al.

11 v.

12 Meta Platforms, Inc., Instagram, LLC, Meta
13 Payments, Inc., Meta Platforms Technologies,
14 LLC

15 Office of the Attorney General, State of Florida,
16 Department of Legal Affairs

17 v.

18 Meta Platforms, Inc., Instagram, LLC., Meta
19 Payments, Inc.

20 State of Montana, *ex rel.* Austin Knudsen,
21 Attorney General

22 v.

23 Meta Platforms, Inc., Instagram, LLC, Facebook
24 Holdings, LLC, Facebook Operations, LLC, Meta
25 Payments, Inc., Meta Platforms Technologies,
26 LLC, Siculus, Inc.

27 **IN RE: SOCIAL MEDIA ADOLESCENT
28 ADDICTION/PERSONAL INJURY PRODUCTS
 LIABILITY LITIGATION**

29 THIS DOCUMENT RELATES TO:
30 4:22-md-03047; 4:23-cv-05448; 4:23-cv-05885;
31 4:24-cv-00805

MDL No. 3047

Case No. 4:22-md-03047-YGR
4:23-cv-05448-YGR
4:23-cv-05885-YGR
4:24-cv-00805-YGR

**DECLARATION OF BIANCA MIYATA
IN SUPPORT OF STATE ATTORNEYS
GENERAL'S ADMINISTRATIVE
MOTION FOR STAY**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

I, BIANCA MIYATA, declare and state as follows:

1. I am a Senior Assistant Attorney General in the Consumer Protection Section of the Colorado Department of Law. I am a member of good standing of the State Bar of Colorado. I make this declaration based on my own personal knowledge. If called upon to testify, I could and would testify completely to the truth of the matters stated herein.

2. I submit this declaration, as required by Civil Local Rule 7-11, in support of the State Attorneys General's Administrative Motion for Stay.

3. On September 6, 2024, this Court issued its Order Granting-in-Part and Denying-in-Part Meta’s Request for Party Discovery on Third-Party State Agencies Pursuant to Fed. R. Civ. P. 34 and Granting Meta’s [sic]¹ First, Second, and Third Administrative Motions for Leave to File Supplemental Information. Doc. 1117.

4. The State AGs intend to file an objection to the Order through a Motion for Relief on September 20, 2024.

5. The State AGs seek a stay of the Order pending Judge Gonzalez Rogers' resolution of their objection and Motion for Relief.

6. On September 19, 2024, counsel for Meta wrote that they cannot consent to a stay due to concerns about undue delay and Meta's need to progress discovery from the State AGs.

7. The State AGs submit this declaration in lieu of a stipulation because Meta has indicated that it cannot consent to a stay.

I declare under penalty of perjury that the foregoing is true and correct. Executed on September 20, 2024, in Denver, Colorado.

/s/ *Bianca E. Miyata*

BIANCA E. MIYATA

Senior Assistant Attorney General

¹ The caption of the Order refers to “Meta’s” Administrative Motions. In the Order, the Court granted the State AGs’ three Administrative Motions for Leave to File Supplemental Information (Doc. 1031, 1074, and 1110). The reference to “Meta’s” Motions appears to be a minor typographical error.